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May 21, 2024

Hon. Denise Cote  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: United States v. Martinez 23-Cr-673 (DLC)

Hon. Judge Cote:

I am assigned to represent Mr. Martinez in the above-captioned matter. Trial is scheduled to begin on October 7, 2024. I write to inform the Court that there has been a breakdown of communication in this matter such that it affects the work to be done on the case, and Mr. Martinez wishes to seek substitution of counsel. The breakdown in the attorney-client relationship is irreparable and I respectfully request the Court grant this application for substitution of counsel.

Mr. Martinez lives in Pennsylvania, and should the Court deem it appropriate to assign the CJA attorney on duty, I could contact the Magistrate Court for remote assignment. Should the Court wish to schedule a hearing on this request for substitution of counsel, the parties are available on any day after May 24, 2024, after 3:00 p.m. as Judge Torres ends her trial day at 3:00 p.m. and I am at trial before her for the next 4 to 6 weeks. As we start jury selection tomorrow, Judge Torres sits the entire day until a jury is picked.

Respectfully submitted,

/s/Sabrina P. Shroff